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IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
JAMES GRANGER, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Kenneth E. Morris #163573 )

Full name and prison name of  
Plaintiff(s) )

v. )

John Hamm, ADOC Commissioner,  
Cam Ward, Dir of Parole Board )

\_\_\_\_\_)  
\_\_\_\_\_)  
\_\_\_\_\_)

Name of person(s) who violated your  
constitutional rights. (List the names  
of all the person.) )

CIVIL ACTION NO. 2:23-cv-001-MHT-CWB  
(To be supplied by Clerk of U.S. District  
Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Bullock Correctional Facility  
104 Bullock Drive, Union Springs 36089

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bullock Correctional Facility, Health Care Unit

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	John Hamm, ADOC Comm.,	301 South Ripley St. Montgomery,
2.	AL	36130-1501
3.	Cam Ward, Dir. of Parole Board,	100 Capital Commerce Blvd.
4.	Montgomery, AL	36117
5.		
6.		

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED December 23, 2021

I was notified on 2-10-2022

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Being subjected to discrimination by ADOC Comm.

John Hamm and Cam Ward, Dir. of Parole Board for Medical Furlough and Medical Parole based on being convicted of a sexual offense, thus, I am being subjected to deliberate indifference to a serious medical condition and treatments needed. (See Attached Page)-1-

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See Attached Pages

GROUND TWO: See Attached Pages

SUPPORTING FACTS: See Attached Pages

GROUND THREE: See Attached Pages

SUPPORTING FACTS: See Attached Pages

**GROUND ONE (continued):** By being subjected to a deliberate indifference to serious medical treatments needed of a prisoner, constitutes the unnecessary and wanton infliction of pain, the due-process clause makes the 8th Amendment prohibiting against cruel and unusual punishment. Deliberate indifference is required in that the prison officials do know of and is in disregards of an excessive (risk) to the inmate's health or safety, the officials are aware of the facts from which the inference is drawn that a substantial (risk) of (serious) harm exists and he must also draw the inference (harm) thus, an 8th Amendment claim requires proof of (1) an objective exposure to substantial (risk) of harm and (2) deliberate indifference of a prisoner official where (A) the official has subjective knowledge that the inmate faces a substantial (risk) of harm and (B) disregard that (risk).

**SUPPORTING FACTS FOR GROUND ONE:** On February 10, 2022, at 8:30am, I met with (HSA) Ms. Jackson in the Health Care Unit in her office along with Warden Thompson, SRP Region Supervisor and the special need manager from Montgomery, AL. I was given a copy from AR-708 Administration Regulation Section (C) from page 16, which stated this (ACT) shall not apply to inmates convicted of capital murder or a sexual offense (See Exhibit ) I am being subjected to discrimination based on being convicted of a sexual offense and not on my health condition.

**GROUND TWO:** My 5th, 8th and 14th Amendment rights to due-process and equal protection of the laws are being violated by ADOC and the Bureau of Pardon and Parole Board. No state shall make of enforce (any law which shall abridge the "privileges" or immunities of citizens of the United States: nor shall any state deprive any person of "LIFE," liberty or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the law by being denied medical furlough and medical parole by subjecting me to (1) discrimination based on being convicted of a sexual offense, and (2) I am being subjected to "due process clause" makes the 8th amendment "prohibits" against "cruel and unusual punishment inflicted.

**SUPPORTING FACTS FOR GROUND TWO:** My medical condition: on August 26, 2019, I had a heart attack and I was diagnosed with a cardiovascular heart disease known as "**arteriosclerosis**" which is hardening of the main arteries coming from the heart. On August 27, 2019, I had a double by-pass heart surgery in which they removed an artery from my leg. Since then, I have been in 5 different hospitals, dealing with the by-pass issues. This is a disease that has no cure. I am only taking blood thinner (clopidogre 75mg) Isosoribide 30mg) and (Metoproltar 50mg). I have the medical documents to support this claim.

**GROUND THREE:** On July 6, 2021, I had a consultation with a neuro surgeon specialist, Dr Timothy Holt. After reviewing the MRI and Catscan, I was diagnosed with spinal stenosis which is called severe cervical spondylosis, in which the damage can be permanent. If "**untreated**", permanent nerve damage can and will cause "**paralysis**", loss of power to move any part of the body or death. There is no cure for the disease itself and will worsen as a person grows older. I am 58-years old now.

**SUPPORTING FACTS FOR GROUND THREE:** On October 18, 2021, I had surgery on my neck, where plates and rods were placed at the base of my skull to try and stabilize my neck from popping because there was no cartilage tissue between my disc and vertebra, causing the bones to rub together and deteriorate. Also on May 16, 2022, I had a lower lumbar surgery. This procedure that was done, was a fusion, where over 6 or more inches of my vertebra were removed down to my pelvis bone to create more space for my spinal cord and it won't become compressed from the middle of my back to my pelvic bone. This was reconstructive. The screws have come loose due to the deteriorating disc and vertebra. On January 17, 2023, I will have another surgery on my neck due to broken plates and screws coming loose. The State Correction Department is only giving me surgery and no type of treatment is being provided to me. I am being denied proper medication and treatment. I am also suffering from severe muscle spasms that cause uncontrollable movement of my legs and arms.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I am seeking a medical furlough or a medical parole release

I am being denied proper medical care and treatments

I am being subjected to discrimination based on my crime

and not my debilitating health. My 8th and 14th Amendment

rights are still being violated. I seek no monetary award

I just want a release so that I can get the proper treatment.

I also ask for an attorney in this case. Kenneth E Morris  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 29, 2022  
(Date)

Kenneth E. Morris 1163573  
Signature of plaintiff(s)

Kenneth E. Morris, AIS# 163573  
Bullock Correctional Facility  
P.O. Box 5107, I1-65A  
Union Springs, AL 36089



Office of the Clerk  
United States District Court  
One Church Street, Suite B-110  
Montgomery, AL  
36104-4018